

# Williams · Bradbury

A T T O R N E Y S   A T   L A W

RECEIVED

2016 FEB 19 AM 11:27

IDAHO PUBLIC  
UTILITIES COMMISSION

February 19, 2016

Ms. Jean Jewell  
Commission Secretary  
Idaho Public Utilities Commission  
472 W. Washington  
Boise, ID 83702

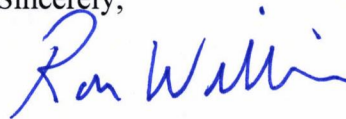
Re: INT-G-16-01

Dear Ms. Jewell:

Please find enclosed an original and seven copies of the Answer of Respondent Intermountain Gas Company for filing in the above referenced case.

Thank you for your assistance in this matter. Please feel free to give me a call should you have any questions.

Sincerely,



Ronald L. Williams

RLW/jr  
Enclosures

Ronald L. Williams, ISB No. 3034  
Williams Bradbury, P.C.  
1015 W. Hays St.  
Boise, ID 83702  
Telephone: (208) 344-6633  
Email: ron@williamsbradbury.com

Attorneys for Respondent Intermountain Gas Company

**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

ERIC CONRAD,	)	Case No. INT-G-16-01
	)	
Complainant,	)	<b>ANSWER OF RESPONDENT</b>
	)	<b>INTERMOUNTAIN GAS</b>
vs.	)	<b>COMPANY</b>
	)	
INTERMOUNTAIN GAS COMPANY,	)	
	)	
Respondent.	)	
	)	

---

**COMES NOW** Intermountain Gas Company (“IGC”, “Intermountain” or the “Company”), in response to the Complaint filed by Mr. Eric Conrad at the Idaho Public Utilities Commission (“Commission” or “Idaho PUC”) and the Summons issued by the Commission on February 1, 2016, states as follows:

**INTRODUCTION**

Mr. Conrad’s Complaint and the Commission’s four areas of inquiry focus on the IGC processes for informing customers about meter protection requirements, and whether those processes are fair, adequate and reasonable to IGC customers. Before addressing these four questions however, IGC believes it is also important to understand “why” meter protection is important. In a nutshell, the answer to this question is “safety”.

Intermountain is committed to safety, beginning with the Company’s Corporate Mission Statement and continuing with the “safety mindedness” ingrained within the everyday attitudes

of IGC employees. This commitment to safety is unwavering and extends to all aspects of IGC's business operations, including public safety, employee safety, emergency services safety and pipeline safety. As it relates to meter protection, Intermountain takes very seriously the need to keep its natural gas meters, and the customer piping connected to its meters, protected from environmental hazards. This necessary focus is embodied within the Company's procedures which address the need to keep snow and ice from compromising gas meters. Snow or ice falling from a roof can strike an unprotected gas meter with an impact sufficient to crack or break the gas piping or fittings at or around the meter, either on the outside or as they enter a structure. Consequently, the Company is always concerned and vigilant that gas meters be and remain protected from weather related environmental hazards.

As more fully delineated below, IGC expects a builder to be knowledgeable of codes and standards regarding the protection of meters, and IGC relies on builders to be its partner in meter safety. Intermountain also believes it has a duty to raise the awareness of meter safety issues by communicating with its customers and with builders the importance of meter protection from weather and environmental hazards.

### **COMMISSION AREAS OF INQUIRY**

**Inquiry No. 1 - What written material is available and distributed to customers regarding meter protection structures in areas of heavy or deep snow? Please provide copies of such materials.**

**Response to Inquiry No. 1** – Attached as Exhibit No's. 1 and 2 are the information given to IGC customers and builders, regarding meter protection in areas of heavy or deep snow. The mailer shown in Exhibit No. 1 is given to new customers at the time the customer relationship is established with the Company. This same mailer is also distributed once per year during Intermountain's January billing cycle. Exhibit No. 2 includes two versions of a letter

provided to builders when they select gas service from Intermountain for a home or structure they are about to construct. The builder's letter from IGC addresses the importance and the necessity to comply with the requisite protections to the customer's natural gas meter. Given the many factors involved with each customer's building conditions (snow fall levels for the region, the location of the home in relation to predominant weather patterns, the height, pitch and size of the roof, the roof type and the surrounding landscape, etc.), it should be noted that this communication is not specific as to the exact meter protection design specifications. Together, Exhibit No's. 1 and 2 inform and remind IGC customers and builders of the need for meter protection when environmental hazards, in conjunction with an improperly protected meter, can put their safety at risk.

In addition to these distributed materials, IGC's Procedure 4017 (Exhibit No. 3), which is on file with the Commission and which was provided to Mr. Conrad, states under sub-paragraph D:

1. In deep snow areas, snow sliding off the roof should also be considered a damaging force. Snow shields shall be installed if necessary.
2. If a safe meter location cannot be identified on a home or building, an engineered structure that allows adequate ventilation and is designed to meet the potential snow load can be used to protect the meter and must be in place prior to service being activated.
3. If an engineered structure for meter protection is used, an engineer's signature will be needed approving the structure's design and ability to protect the meter from snow and ice.

**Inquiry No. 2 - Describe in detail how Intermountain Gas disseminates information to customers, builders, contractors and others about meter protection requirements.**

**Response to Inquiry No. 2** – In addition to the disseminated written materials highlighted in the Company's Response to Inquiry No. 1, Intermountain employs additional



communication avenues to inform our customers, builders and contractors regarding meter protection requirements.

The Company utilizes personal face-to-face communications to address, with its customer and/or builder, the safest location for the customer's meter. Because each situation is unique in terms of the architectural design of the building and the potential for that design to impact the safe functioning of the natural gas meter, there is not a "one size fits all" safety solution. In the case of meter protection from snow and ice, IGC's Consumer Sales Representatives provide personalized communication to the customer pointing out potential environmental hazards. The customer is advised to locate the meter where it will be protected from falling snow, ice and dripping water. If, for instance, the meter is in the drip-line of a non-gabled end of the roof, then the meter is considered unprotected. These meter safety related issues are communicated to the owner/builder at the time a new service is initiated.

As part of this face-to-face communication, if the customer or builder insists on locating the meter in an unprotected location, IGC then advises the customer or builder to provide an engineered snow shield over the meter location as noted on IGC Procedure 4017, subparagraph D, item 2 ("an engineered structure that allows adequate ventilation and is designed to meet the potential snow load can be used to protect the meter"). As also noted in this subparagraph, the engineered protection structure "must be in place prior to service being activated".

IGC also relies on the builder's requisite knowledge of the Codes and Standards that pertain to meters and regulators needing protection from environmental forces, such as snow and ice (see Exhibit No. 4). Builders, engineers, and architects who operate consistently in IGC's high snow areas are aware of the requirements to site the meter in a protected location or provide an engineered designed meter protection solution. Builders and owners who don't often build in

areas of snow should take the necessary steps to identify the unique building standards for these areas.

To reinforce the builder's requirements pertaining to protected meters, IGC sent a letter to builders at the time the Company's meter protection program was initiated (see Exhibit No. 2). This initial written communication was followed-up with personal communication as each builder requested a new natural gas service line. Following this initial roll-out communication, the Company's Idaho Falls District sends a letter to the builders at the beginning of the building season each year (end of March beginning of April time period). This has been the Idaho Falls District's practice since 2010. The Idaho Falls mailing list consists of builders who have built homes the previous year. For example, every builder that built a new house in 2015 will get the aforementioned letter in March/April of 2016.

J.B. Kay Construction ("JBK") was the builder for Mr. Conrad and was not a builder of record for IGC since. According to IGC's records, JBK had not built a structure using gas since 2006. Consequently, JBK was not a recipient of this IGC letter to builders. However, when JBK called to request gas service for Mr. Conrad's home on October 7, 2015, JBK was informed of the possible snow shield requirement as JBK had already installed pipe to the outside at a potentially unsafe location (*"[Customer] Advised may need meter protection. Already piped out."* See Service Line Work Order, Exhibit No. 5).

In addition to the Company's direct mailing efforts, IGC employs advertising to communicate the importance of protecting the natural gas meter when heavy snow or ice is an issue. During years with normal to heavy snow, for instance, IGC advertised in the most likely affected regions. The most recent advertising was done during the winter of 2011 (see Exhibit No. 6). IGC is also planning similar advertising during 2016.

**Inquiry No. 3 - Describe the training of Company employees and the frequency of such training about meter protection requirements.**

**Response to Inquiry No. 3** – The Company’s Consumer Sales Representatives, Operations Assistants and Engineering Associates are all trained regarding meter protection requirements during their initial employment with the Company. These employees are trained to recognize that when the natural gas meter is located in the drip-line of a non-gabled end of a roof, the meter is unprotected and unsafe. When a customer or builder insists on an unprotected location, or if the roof line is unknown, these same employees are trained to provide direction to the builder/owner that engineer designed meter protection is required. These same employees are trained to note this event on the Company’s Service Line Work Order. Once the proper meter protection is in place and documented, these Company employees are then allowed to set the meter and they note this information on their order completion (see Exhibit No. 7).

**Inquiry No. 4 - Explain when the IGC Procedure Section C (Riser and Meter Set Locations) 6 (f) “IGC will provide protection for meter sets when required” is applicable and to what type of customer.**

**Response to Inquiry No. 4** – IGC’s Procedure 4017 (Exhibit No. 3) for siting service lines and meter sets is used by the Company as a guideline when determining the safe location of a service line, meter set, riser and routes for service lines. This same procedure attempts to embody applicable safety codes and procedures. This procedure should be viewed as a whole and with sections of it not selectively quoted and taken out of context. This is important because sections of the procedure address meter locations, while other sections address meter protections. For example, the procedure states “The meter shall be located at the point on the structure...protected by gutter or eave line if possible, on the gabled end if possible”. In another

section the procedure outlines when and what kind of meter protection is needed. In other words, proper meter location obviates the need for additional meter protection.

With regard to the section in question, “IGC will provide protection for meter sets when required”, Intermountain’s intended use of the word “required” is contextual, not literal. IGC will provide, on its own behalf and at its own cost, meter protection to older existing services when the risk for damage to the meter by non-weather related actions becomes a concern, or if such non-weather related damage has already taken place. By way of example, IGC can provide protection from vehicle intrusions or provide fencing when a meter needs isolation from pedestrian traffic.

Conversely, Intermountain does not and has never considered snow shields at a new service installation to be required – at IGC’s expense – when other construction options for meter protection are readily apparent, available and should have been planned for in construction design. For example, in Mr. Conrad’s instance, an alternative piping layout to a protected exterior location would have eliminated the need for an engineered snow shield over his meter. In such a case, IGC does not consider a snow shield as being “required”. When, as in Mr. Conrad’s case, the customer insists on an unprotected meter location, it is the customer’s responsibility to provide an appropriately engineered meter protection structure.

#### **ADDITIONAL AREAS OF ANSWER**

Safety as a Number One Concern: The root cause of Mr. Conrad’s complaint with IGC is that Mr. Conrad, or his builder, selected a natural gas meter location that required additional, and necessary, protective measures, when other options were available. When Mr. Conrad and his builder were alerted to this problem, Mr. Conrad went in search of precise meter protection specifications that, for the reasons explained in the Response to Inquiry No. 2 above, do not and cannot exist, at the level of detail he expected to find. In an attempt to further assist Mr. Conrad,

IGC provided pictures/examples of previously approved meter shield designs and referred Mr. Conrad to a local fabrication shop that manufactures approved designs.

To make matters worse, Mr. Conrad and his builder initially installed a temporary meter protection shield that did not comply with the engineering requirements of Procedure 4017. As a result, IGC refused to install its meter. Mr. Conrad then purchased and installed an approved meter protection shield from the local fabrication company and IGC installed Mr. Conrad's natural gas meter on November 19, 2015. The attached Exhibit No. 8 depicts the non-approved meter protection shield originally built and located by Mr. Conrad and the currently installed approved shield purchased by Mr. Conrad which provides his natural gas meter with the necessary safeguards against environmental hazards.

Intermountain understands Mr. Conrad's frustration with the process. However, as exemplified throughout this response, Intermountain's commitment to safety is unwavering and extends to all aspects of its business. While promoting safety, Intermountain concurrently strives to build positive relationships with its customers. Unfortunately, in Mr. Conrad's instance, these twin goals of safety and customer service came into conflict. In such a situation, IGC was forced to choose safety as its number one priority.

Mr. Conrad's Requested Relief: Mr. Conrad requests two areas of relief: (i) compensation, and (ii) review and revision of IGC's rules or procedures as it relates to meter protection.

With respect to the second area, Intermountain agrees with Mr. Conrad that procedure 4017 can be revised to more clearly direct the reader to the applicable citations within the Procedure. Intermountain will begin the process of making these enhancements to Procedure 4017, in collaboration with Commission Staff.

Regarding the second area of requested relief – compensation – Intermountain hopes to begin the process of building goodwill back with Mr. Conrad and agrees to reimburse Mr. Conrad, in the form of billing credits, for his cost of a Gas Cover (\$220) and the labor to install the cover (\$150), provided Mr. Conrad provides IGC with invoices of these two amounts. Intermountain also recognizes the unique factors involved in this case, and that such an accommodation to Mr. Conrad does not constitute a precedent that builders are now free to design and set meters in environmentally unprotected areas and that IGC will pay for additional meter protections.

Intermountain declines to also reimburse Mr. Conrad \$1,010.82 in “construction loan interest” because of the tenuous relationship between the construction interest and: (i) Intermountain’s legitimate safety concerns, (ii) the yet quantified “delay period”, (iii) other construction activities that may have taken place during this delay period, and (iv) Mr. Conrad’s actions that may have contributed to the delay.

Dated this 19<sup>th</sup> day of February, 2016.

Respectfully submitted,



---

Ronald L. Williams  
Williams Bradbury, P.C.  
1015 W. Hays St.  
Boise ID, 83702  
Telephone: 208-344-6633  
ron@williamsbradbury.com  
Attorneys for Intermountain Gas Company

**CERTIFICATE OF DELIVERY**

I hereby certify that on this 19th day of February, 2016, I caused to be served a true and correct copy of the Answer of Intermountain Gas Company upon the following individuals in the manner indicated below:

**Hand Delivery:** (original & 7 copies)

Jean Jewell  
Commission Secretary  
**Idaho Public Utilities Commission**  
472 W. Washington Street  
Boise, ID 83720

**Mail and Electronic Delivery:**

Eric W. Conrad  
**Complainant**  
[ericwconrad@gmail.com](mailto:ericwconrad@gmail.com)

2277 Hendricks Circle  
Rexburg, ID 83440

(Alternative mailing address)  
1030 S. 2<sup>nd</sup> E.  
Rexburg, ID 83440



---

Ronald L. Williams



## Keep Snow and Ice Away From Meters

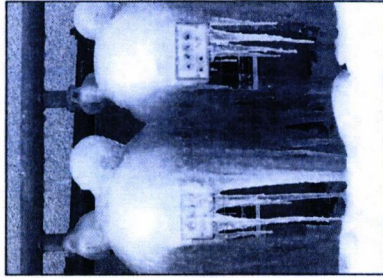
As we enter the winter season and the snow begins to fall, Intermountain Gas Company encourages customers to inspect their natural gas meters on a regular basis to make sure snow and ice have not built up on the meter.

### Why is it important to keep your meter clear of snow and ice buildup?

- ▲ Accumulated snow places stress on your meter piping and could harm the meter.
- ▲ Excessive snow cover may result in abnormal pressure, affect appliance operation and interrupt your service.
- ▲ Response crews will need clear access to your meter during an emergency.

### Meters are designed to withstand extreme weather conditions, but remember to protect them from ice and snow buildup during the harsh winter months.

- ▲ Snow and ice can damage gas meters and pipes.
- ▲ When removing heavy accumulations of snow or ice, do not strike meters with snow blowers, blades or shovels.
- ▲ Do not kick your meter to break or clear ice.
- ▲ Protect your meters by removing overhead icicles and snow from eaves and gutters to ensure they do not cause damage as they fall. Also, dripping water can splash and freeze on the meter or vent pipes, which could affect proper operation.



Customers are encouraged to **carefully** clear the snow and ice away from the meter for safety.

FRONT IMAGE



### Meter Reading and Safety Requires Clear Access to Meter at All Times

Ice and snow may block the electronic reading of your meter. Our desire is to accurately bill your natural gas usage.

- ▶ Please keep the area in front of and around your gas meter clear at all times. If you are storing a boat or trailer in front of your meter, try not to completely block off the meter.
- ▶ Please contact Intermountain Gas to discuss the building of decks, boxes or landscaping planned around your meter to avoid creating a hazardous situation.

### Excavation damage prevention

The greatest risk to underground natural gas pipelines is accidental damage during excavation. Using recommended practices prevents harm to pipelines and services on your property. Call the number 811 before you dig.



If you believe damage has occurred around the meter, or you have no heat or smell gas, call Intermountain Gas Company immediately.

**All Emergencies - 24-Hour Response - 1-877-777-7442**

#### Customer Service

Boise / Treasure Valley Area: 208-377-6840  
All Other Areas: 1-800-548-3679  
Call 7 a.m.-7 p.m. Monday-Friday  
[www.intgas.com](http://www.intgas.com)

Thank you for your cooperation.

Follow Intermountain  
Gas Company on  
Facebook.



IF YOUR NATURAL GAS SERVICE IS INTERRUPTED FOR ANY REASON, PLEASE CALL US IMMEDIATELY: 1-877-777-7442.

01/16

BACK IMAGE

**EXHIBIT 2 – BUILDER LETTERS FOR SNOW PROTECTION – 2 VERSION HISTORY**

Exhibit 2A

October 18, 2013

Builder or Dealer Name

Business Name

Address

Town, Idaho ZIP

RE: Meter Protection

Dear Builder or Dealer.

It has **always been a priority** for Intermountain Gas Company to comply with federal, state, and local jurisdiction codes, as well as the manufacturer's recommendations concerning the safety of the Natural Gas metering system. Intermountain Gas Company will ensure the ongoing safe operation to you and our mutual customers through enforcement of meter set locations.

**Meter locations on a "gable" end of the building or home is preferred** because it provides protection from any rain or snow run off or other possible hazards. Meters cannot be located under roof valleys or eaves where run off due to rain or snow may affect the meter.

If a safe meter location cannot be identified on a building or home, an engineered structure that allows adequate ventilation and is designed to meet the potential snow load can be used to protect the meter and must be in place **prior to service being activated**. Our sales staff will be documenting the need for meter protection on the service line work order at the time the meter location is determined and the service is ordered. Our service technicians have been instructed to deny the request for a meter if that protection is not in place when they go to set the meter. Once the meter protection is in place and the meter is set, the service technician will document their order.

Thank you for your cooperation and support in providing our mutual customers with safe and efficient service as well as the best value, Natural Gas.

If you have any questions, please contact the Consumer Sales Representative in your area.

Respectfully,

Teri TeNgaio  
Teton District Manager

Exhibit 2B

(Date)

XYZ Builder or Dealer or Architect  
Builder or Dealer Business Name  
Address  
Town, Idaho ZIP

Dear XYZ,

Thank you for your support and selection in using Natural Gas for your building's energy needs. We enjoy our joint partnership in providing safe, efficient and the best energy value, Natural Gas, to our mutual customers.

It has always been a priority for Intermountain Gas Company to comply with federal, state and local jurisdictional codes, as well as the manufacturer's recommendations concerning the safety of the Natural Gas metering system. Intermountain Gas Company will ensure the ongoing safe operation to you and our mutual customers through enforcement of meter set locations in such a manner and location to comply with appropriate codes.

For example, meter locations can not be located under roof valleys and eaves where run off due to rain and snow may affect the meter set. Meter locations on any "gable" end of the home's roof line that provides protection from any rain and snow run off or other possible hazards will be allowed.

If a safe meter location can not be identified on a home or building, an engineered structure that allows adequate ventilation and is designed to meet the potential snow load can be used to protect the meter and must be in place prior to service being activated.

If an engineered structure is used, an engineer's signature will be needed approving the structure's design and ability to protect the meter from snow and ice.

Please contact the Customer Sales Representative in your area for further details or if you have any questions.

Again, thank you for your support!

Sincerely,

Teri TeNgaio  
Teton District Manager

cc: file

## IGC PROCEDURES

---

DATE: 01/31/05

### **TITLE: Siting Service Lines and Meter Sets**

NUMBER: 4017

[REFERENCES](#) | [PURPOSE](#) | [SCOPE](#) | [GENERAL](#) | [RESPONSIBILITY](#) | [STANDARDS](#) | [SERVICE LOCATIONS](#) | [METER LOCATIONS](#) | [EXAMPLES](#)

### **REFERENCES**

#### ***Regulations***

IGC General Service Provisions  
49 CFR 192, 351, 353, 355, 357

#### ***Policy***

[501](#) Gas Delivery Pressure

#### ***Procedures***

[4019](#) Curb and Other Property Line Valves  
[4015](#) Upstream Regulation of High Pressure Service Lines (Farm Taps)  
[4016](#) Roof Top Distribution System  
[9375](#) Service Line Installations  
[4026](#) P.E. Plastic Pipe System Design and Installation

### **PURPOSE**

Provide proper guidelines for determining service line, meter set, and riser locations and routes for the service line that are acceptable and safe under the General Service Provisions and applicable safety, building codes and operating policies.

### **SCOPE**

Applies to all Company personnel assigned the responsibility of selecting service line routes and meter locations.

### **GENERAL**

Service lines will be installed at the minimum total length necessary to conform with Company requirements regarding meter set locations.

The criteria for service lines to be installed in conjunction with new mains is contained in [Procedure 9371](#) Plant Additions-Revenue.

When a service line cannot be located according to the requirements of this Procedure, contact the Operations/Division/District Manager for instructions.

As described in Section A, Paragraph 12.9 of the General Service Provisions, a second service line will be installed for a customer only when the second location is justified and more than fifty (50) feet from the existing service line. See also [4016](#), Rooftop Distribution Systems, and [9375](#), Service Line Installation.

Meter sets will be located along the wall of the structure least susceptible to future building, fencing or

other additions. Residential meter sets will not be located in the rear of the dwelling, unless circumstances are such that the rear of the dwelling is the most feasible and desirable location available

(townhouses, alley distribution system, etc.). When a Service Line application shows a rear meter location, an explanation of the conditions requiring such a location must be included on the [512-A](#). This explanation will be reviewed and accepted by the Marketing Manager and submitted to the Regional/Division/District Manager for approval prior to installation of the service line.



## RESPONSIBILITY

The Operations Managers are responsible for the administration of this Procedure.

## STANDARDS

### A. Selecting Service Locations

1. Precautions to take regarding service locations
  - a. When possible, select a termination location for the service line that is at least twelve inches (12") from other underground facilities. If it is a joint trench service line, ensure that the service is installed according to joint trench specifications.
  - b. Do not run plastic systems within the influencing area of any system that radiates temperatures above 100° F. If there is a concern that this may occur, contact General Office Engineering for necessary calculations.
2. When paralleling a foundation for more than five (5) feet, select a location for the service line at least three (3) feet from the foundation, whenever possible. If a basement has been excavated, and there could be excessive soil settling, the service should be run outside of the disturbed soil area.
3. Whenever paralleling a sidewalk or retaining wall and if possible, select a location at least one (1) foot from the sidewalk and three (3) feet from the retaining wall, when possible.
4. Select service line locations so that adjacent private property is not crossed unless a properly executed right-of-way agreement is obtained.
5. Whenever possible, avoid selecting line locations where the service will pass under concrete slabs, carports or through retaining walls. Avoid periodic maintenance areas over septic tanks, oil and gasoline tanks etc.
6. Whenever possible install service line locations so that the service line will run in a straight line from the stub or tee to the service line riser location.
7. Consider possible future additions to the property and locate the service so that it will not be built over or have the meter location fenced in at a later date.
8. Any service lines running under a building will be encased. The casing will be sealed and vented to the outside at the point where it enters the building. Service lines will not be installed under a building without Operations Manager approval.

### B. Riser and Meter Set Locations

1. Position the riser and meter set in a readily accessible location. The meter and meter stop must be easily accessed in case of emergencies and for routine maintenance and meter reading.
2. When possible, select a location outside an area that is, or may be fenced.
3. The meter shall be located at the point on the structure:
  - a. As close to stub or main as possible.
  - b. Protected by gutter or eave line if possible.
  - c. On the gable end if possible.
  - d. If main line is in the front of the structure; place riser as close as possible to the front of the structure; however, the service riser and meter shall be located at least 18" horizontally from an electrical meter. (See Example 1) (Most common distance is four (4) feet.)
  - e. If main line is behind the house; place the riser at the closest point in the back of the structure maintaining the 18" horizontal distance from the electrical meter or service panel.
4. Manifolds shall be located in the same manner as single meters and allow for the required width for the number and size of the meters. If a stack manifold is required, the upper portion shall be secured to the structure during installation.
5. When the meter and service regulator will be installed outside the building, select location of service line riser to meet the following:
  - a. Service line riser will be located a minimum of twelve inches (12") from the building and protected from anticipated traffic, possible flooding and other sources of damage.

Where a main customer valve is used, an additional 3" to 4" shall be needed for house line installation. Large meter sets shall be sited as needed for clearance.
  - b. Do not locate under or in front of windows or other building openings which may be used as emergency fire exits or under interior or exterior stairways.
  - c. When the service line riser is on the driveway side of a dwelling, at least three (3) feet of spacing between the driveway and the building is necessary. Additional protection will be provided, such as a meter guard. (See Example 5)
  - d. Where a service line riser is likely to be set in paving of any kind, a short piece of two inch (2") or larger P.E. pipe will be used to sleeve the pipe at ground level.
  - e. When a meter is set outside a school, a permanently locked fence or enclosure may be provided by the Company.
  - f. IGC will provide protection for meter sets when required.
  - g. When locating a riser for a large meter set, adequate space and access shall be provided to allow for normal maintenance and testing.
6. Select location for service line and service line riser and meter set for large commercial and industrial services to meet the following additional requirements:
  - a. When the service line will parallel the foundation, a minimum of five (5) feet clearance from the building will be maintained.
  - b. The meter will not be located directly underneath and will have at least three (3) feet minimum horizontal clearance from an electric panel, air intake or any equipment that could possibly be a source of ignition.

- c. Space requirements for large meter sets will be determined from the meter set design. See specified or standard meter set drawings.
  - d. When meters are set outside a school, a permanent locked fence or enclosure may be provided by the Company.
  - e. When meters are set outside a church and extra security is necessary, a permanent locked fence or enclosure, with IGC access, is to be provided by the customer.
7. When the meter and service regulator will be set inside the building, the location for the service line riser will meet the following requirements:
6. NOTE: Written approval must be obtained from the Operations Manager for any inside meter set. That approval must be attached to the asbuilt drawing on Form 512-A or 319.
- a. The service line riser, meter stop and service line entrance into the building will be as near as practicable to the meter and regulator location.
  - b. When possible, the service line riser and meter stop will be above ground outside the building and the entrance of the service line into the building will be above ground with a readily accessible outside shut-off valve.
  - c. Any service entrance into the building below ground will incorporate an outside curbvalve and will be cased and the casing sealed at the points the service line enters and exits the casing. The casing must be vented to the outside atmosphere.
  - d. All regulators located inside a building must be located in a ventilated area and not less than three feet from any source of ignition or heat which could damage the meter. All inside regulators will be vented separately to the outside of the structure and installed to prevent water buildup and entry of insects and debris.
  - e. A meter and regulator installed in a recessed opening is considered an outside meter set if the following conditions are met:
    - i. The recess has an exterior wall
    - ii. The service line enters the recess above ground (over the sill)
    - iii. The recess is lined with fireproof and vapor-proof material
8. Any service line riser cannot be located to meet the requirements of this Procedure shall be referred to the Operations/District Manager.
- NOTE: IGC will provide protective steel posts for the meter set, when required, where no protection is provided by the customer. Adequate meter protection consists of either the company approved meter guard, (Example 5) a two inch (2") or four inch (4") diameter post, or a permanent protective wall.
9. No meter or service regulator will be located in a pit or vault. Contact the Operations Manager for alternative locations.
  10. When services and meters are on a rooftop system, see Procedure 4016 Rooftop Distribution Systems, for requirements.
  11. Meters installed on manufactured housing where flex connectors are utilized shall have the meter bar assembly stabilized by use of a meter bar support.
- C. Riser and Meter Set Height
1. Standard installation height shall be achieved when the bottom of the stop equals the height of foundation. (Caution should be taken to ensure the bury line on the riser is not below future grade). (See Example 6)
  2. Installation height of larger meters and meters installed on multilevel foundations shall be accomplished by determining future grade according to building specification. This may be determined by:
    - a. Contacting builder
    - b. Reviewing plans
    - c. Future grade indicators that exist or are apparent.
- D. Riser and Meter Height - Heavy or Deep Snow Area's
1. When heavy or deep snow conditions exist, a higher aspect meter set that exceeds the height of a standard installation should be a consideration. (See Example 4)
  2. In deep snow areas, snow sliding off the roof should also be considered a damaging force. Snow shields shall be installed if necessary.
  3. If a safe meter location can not be identified on a home or building, an engineered structure that allows adequate ventilation and is designed to meet the potential snow load can be used to protect the meter and must be in place prior to service being activated.
  4. If an engineered structure for meter protection is used, an engineer's signature will be needed approving the structure's design and ability to protect the meter from snow and ice. (See Example # 7 Approval of Engineered Design for Meter Protection.) This approval shall be signed and added to the asbuilt and added to Scanned Images with the asbuilt
- E. Regulator Venting Requirements
1. Regulators shall be installed vertically with the vent pointed downward
  2. Regulators that cannot be installed with vent pointed downward shall have additional vent piping installed to ensure downward venting
  3. Vents will be screened or have caps installed to prevent entry of water, insects, debris, or foreign objects
  4. In high snow aspect areas vents will be extended to above the anticipated snow level
  5. Extended vent piping will be placed in such a position to prevent entry of water, insects, debris, or foreign objects and protected from heavy snow or water run off
  6. Vent piping will be sized according to the size of the vent opening on the regulator
  7. Vent piping will be secured as necessary
  8. If a meter set is located within three (3) feet of any air intake which is permanently opened into a structure, the regulator will be vented remotely from the area. Note: Windows, whether operable or non-operable, are not considered an air intake.
  9. Meter locations protected under roof valleys and eaves where run off due to rain and snow may affect the regulator vent shall have the regulator vent piping extended to a protected location
  10. All inside regulators shall be vented separately to the outside of the structure and installed to prevent water buildup and entry of insects and debris
- F. Meter Stop Valve Installation and Replacements
1. Service riser applications sized ¾" through 2" (single meter and manifolds) operating at 60 psig or less shall use a valve stop with an

- insulating union incorporated in the body of the stop
2. Greater than 60 psig operating pressure - High pressure installations shall require
    - a. Non insulated stop.
    - b. Insulation shall be obtained by one of the following:
      - i. Insulating union downstream of the secondary pressure regulator
      - ii. Flange gasket insulators at the flanges (2) of a flanged by-pass riser
  3. Maintenance - In the course of performing maintenance to resolve leaking spuds or to remediate cathodic protection issues at the meter set assembly, the following actions should be performed where applicable:
    - a. Replace a non-insulated valve stop with an insulated valve stop,
    - b. Replace meter loop assembly with a pre fabricated meter loop incorporating a customer valve in the meter loop and non-insulated spuds.
    - c. Replace a non-insulated valve stop with an insulated valve stop without a pre fabricated meter loop when alignment with existing house piping is not feasible.

## EXAMPLES

### [EXAMPLE 1](#)

Distance from Electrical Meter

### [EXAMPLE 2](#)

Flex Riser

### [EXAMPLE 3](#)

Support Assembly

### [EXAMPLE 4](#)

High Aspect Riser

### [EXAMPLE 5](#)

Meter Guard

### [EXAMPLE 6](#)

Standard Meter Installation

### [EXAMPLE 7](#)

Approval of Engineered Design for Meter Protection

---

4017 - Siting Service Lines and Meter Sets



## GAS PIPING INSTALLATIONS

**409.2 Meter valve.** Every meter shall be equipped with a shutoff valve located on the supply side of the meter.

**409.3 Shutoff valves for multiple-house line systems.** Where a single meter is used to supply gas to more than one building or tenant, a separate shutoff valve shall be provided for each building or tenant.

**409.3.1 Multiple tenant buildings.** In multiple tenant buildings, where a common piping system is installed to supply other than one- and two-family dwellings, shutoff valves shall be provided for each tenant. Each tenant shall have access to the shutoff valve serving that tenant's space.

**409.3.2 Individual buildings.** In a common system serving more than one building, shutoff valves shall be installed outdoors at each building.

**409.3.3 Identification of shutoff valves.** Each house line shutoff valve shall be plainly marked with an identification tag attached by the installer so that the piping systems supplied by such valves are readily identified.

**409.4 MP regulator valves.** A listed shutoff valve shall be installed immediately ahead of each MP regulator.

**409.5 Appliance shutoff valve.** Each appliance shall be provided with a shutoff valve in accordance with Section 409.5.1, 409.5.2 or 409.5.3.

**409.5.1 Located within same room.** The shutoff valve shall be located in the same room as the appliance. The shutoff valve shall be within 6 feet (1829 mm) of the appliance, and shall be installed upstream of the union, connector or quick disconnect device it serves. Such shutoff valves shall be provided with access. Appliance shutoff valves located in the firebox of a fireplace shall be installed in accordance with the appliance manufacturer's instructions.

**409.5.2 Vented decorative appliances and room heaters.** Shutoff valves for vented decorative appliances, room heaters and decorative appliances for installation in vented fireplaces shall be permitted to be installed in an area remote from the appliances where such valves are provided with ready access. Such valves shall be permanently identified and shall serve no other appliance. The piping from the shutoff valve to within 6 feet (1829 mm) of the appliance shall be designed, sized and installed in accordance with Sections 401 through 408.

**409.5.3 Located at manifold.** Where the appliance shutoff valve is installed at a manifold, such shutoff valve shall be located within 50 feet (15 240 mm) of the appliance served and shall be readily accessible and permanently identified. The piping from the manifold to within 6 feet (1829 mm) of the appliance shall be designed, sized and installed in accordance with Sections 401 through 408.

**409.6 Shutoff valve for laboratories.** Where provided with two or more fuel gas outlets, including table-, bench- and hood-mounted outlets, each laboratory space in educational, research, commercial and industrial occupancies shall be provided with a single dedicated shutoff valve through which all such gas outlets shall be supplied. The dedicated shutoff valve shall be readily accessible, located within the labora-

tory space served, located adjacent to the egress door from the space and shall be identified by approved signage stating "Gas Shutoff."

### SECTION 410 (IFGC) FLOW CONTROLS

**410.1 Pressure regulators.** A line pressure regulator shall be installed where the appliance is designed to operate at a lower pressure than the supply pressure. Line gas pressure regulators shall be listed as complying with ANSI Z21.80. Access shall be provided to pressure regulators. Pressure regulators shall be protected from physical damage. Regulators installed on the exterior of the building shall be approved for outdoor installation.

**410.2 MP regulators.** MP pressure regulators shall comply with the following:

1. The MP regulator shall be approved and shall be suitable for the inlet and outlet gas pressures for the application.
2. The MP regulator shall maintain a reduced outlet pressure under lockup (no-flow) conditions.
3. The capacity of the MP regulator, determined by published ratings of its manufacturer, shall be adequate to supply the appliances served.
4. The MP pressure regulator shall be provided with access. Where located indoors, the regulator shall be vented to the outdoors or shall be equipped with a leak-limiting device, in either case complying with Section 410.3.
5. A tee fitting with one opening capped or plugged shall be installed between the MP regulator and its upstream shutoff valve. Such tee fitting shall be positioned to allow connection of a pressure-measuring instrument and to serve as a sediment trap.
6. A tee fitting with one opening capped or plugged shall be installed not less than 10 pipe diameters downstream of the MP regulator outlet. Such tee fitting shall be positioned to allow connection of a pressure-measuring instrument.

**410.3 Venting of regulators.** Pressure regulators that require a vent shall be vented directly to the outdoors. The vent shall be designed to prevent the entry of insects, water and foreign objects.

**Exception:** A vent to the outdoors is not required for regulators equipped with and labeled for utilization with an approved vent-limiting device installed in accordance with the manufacturer's instructions.

**410.3.1 Vent piping.** Vent piping for relief vents and breather vents shall be constructed of materials allowed for gas piping in accordance with Section 403. Vent piping shall be not smaller than the vent connection on the pressure regulating device. Vent piping serving relief vents and combination relief and breather vents shall be run independently to the outdoors and shall serve only a single device vent. Vent piping serving only breather vents is permitted to be connected in a manifold arrangement



941

EQUIPMENT: ☒ Forced-air Furnace ☒ Water Heater ☒ Other 2 fireplaces, dryer, bbq

## EXHIBIT 6 – ADVERTISING EXAMPLES FOR KEEPING METER CLEAR OF SNOW

12-359-4

30 sec Radio Spot  
Title: Winter Snow

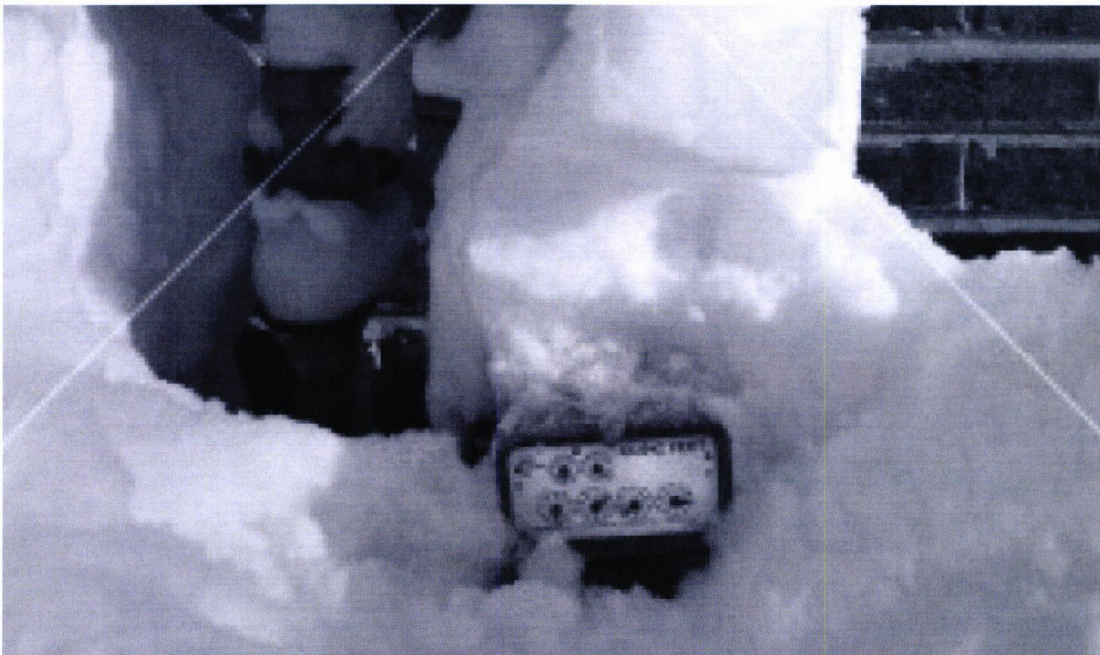
SFX: Blowing wind, car tires spinning. Scrapping windsheilds, etc.

Winter's upon us and here's a tip from your friends at Intermountain Gas. Don't let Old Man Winter hide your gas meter. If you can keep your gas meter clear of snow and ice, our automated meter-reading trucks can get an actual reading of your natural gas usage, otherwise we can only do our best in sending you an estimated bill.

For valuable energy saving tips visit our web site at [INTGAS.com](http://INTGAS.com).

Natural Gas. It's worth asking for.





## OLD MAN WINTER & YOUR GAS METER

Snow season is finally here and you may have to shovel more than your drive. If your gas meter is buried in snow or ice you could have a problem. That's why you need to be sure your meter and/or regulator isn't ice covered or buried. The impact of heavy snow and ice can jar the meter set. If the gas regulator becomes frozen shut, ice may interfere with the supply of gas to your appliances. If your meter is covered with snow right now, please play it safe and CAREFULLY dig it out. And if you have no heat or smell gas, call us immediately.

### METER READING & SAFETY REQUIRES CLEAR ACCESS AT ALL TIMES

Ice and snow may also block the electronic reading of your meter. Please keep the area in front of and around your gas meter clear. That includes storage of boats and trailers. Our desire is to be able to accurately read your meter.

### SAFETY COUNTS

If you dig out your gas meter, *please watch for these warning signs:*

SIGHT	SMELL	SOUND
A dense fog, mist, or white cloud.	A distinctive gaseous odor.	Hissing, whistling or roaring noise.

Call the Intermountain Gas emergency number at 1-877-777-7442 immediately if you experience any of the above.



Boise/Treasure Valley Area: 377-6840  
All Other Areas: 1-800-548-3679  
Call: 7 AM to 7 PM, Monday – Friday  
[www.intgas.com](http://www.intgas.com)



INTGAS PRINT AD: JO3 375 Snow removal

OLD MAN WINTER AND YOUR GAS METER

Snow season is finally here and you may have to shovel more than your driveway. If your gas meter is buried in snow or ice you could have a problem. The impact of heavy snow and ice can jar the meter set. If the gas regulator becomes frozen shut, ice may interfere with the supply of gas to your appliances. If your meter is covered with snow right now, please play it safe and CAREFULLY dig it out. If you have no heat or smell gas, call us immediately.

#### METER READING & SAFETY REQUIRES CLEAR ACCESS AT ALL TIMES

Please keep the area in front of and around your gas meter clear. Our desire is to be able to accurately read your meter. This includes the storage of boats, trailers, as well as snow and ice.

#### SAFETY COUNTS

When you dig out your gas meter, please watch for these warning signs.

SIGHT – A dense fog, mist, or white cloud.

SMELL – A distinctive gaseous odor.

SOUND – Hissing, whistling, or roaring noise.

Call the Intermountain Gas emergency telephone number: 1-877-777-7442 immediately if you experience any of the above conditions

#### NEW IGC LOGO – 811 LOGO – ENERGY STAR LOGO (SMALL)

Boise/Treasure Valley Area 377-6840

All Other Areas 1-800-548-3679

Call: 7 AM to 7 PM – Monday – Friday

[www.intgas.com](http://www.intgas.com)

Exhibit 7 –Meter Set Order Documenting Meter Protection

FIELD AUTOMATION							
Home	Compliance	Construction	FCS	FDM	Mobile Up	PCAD	

**Order Summary**  
PCAD Job ID: IGC-20151118-00454    FA ID: 2221783728    Service Code: G-NEWMTR  
Customer:   
Address: 2277 Hendricks Cir. SUGAR CITY

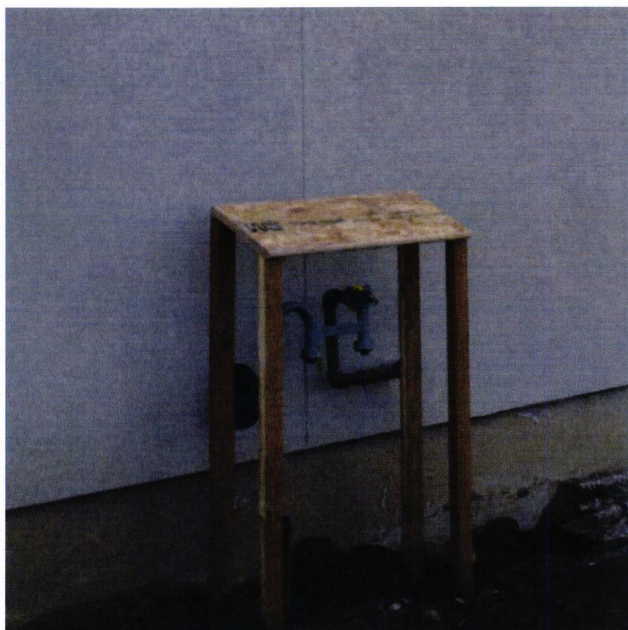
**Action Taken**  
☒ Completed    Meter Action: INSTALL METER    ☐ CGI    CGI Reason:   
☐ Not Completed

**New Meter/ERT Information**  
Meter Number NEW: 482449393    ERT Number New: 90147991    ERT Read: 8830    Number of Dials: NEW  
Verify Meter Number: 482449393    Verify ERT Number: 90147991    Index Read: 8830    Meter Type NEW: AL 425  
Billing Pressure NEW: 0.25    Reg Info: IGC1813C    Meter Location: RS  
Delivery Pressure NEW: 0.25    ERV Info:    Meter Status NEW: 1  
Temp. Compensated: 0    Press. Compensated: 0    Pressure Test?: Y    PSI: 60  
Witnessed By: CITY OF REXBURG

**Additional Order Information**  
**Meter Motion Test**  
Test Performed?: N    Reason Not Performed: NEW METER SET.    Test Dial Size:    Test Time (min):    CFH Usage:   
Regulator Flow:    Lock Up:    Water Heater Temp:   
Found: 7.01    Left: 7.01    Found: 7.63    Left: 7.63    Found:    Left:   
WCT:   
WCT?:    Flue Test?:    Appliances Checked:    Results:   
Red Tag Issued?:    Tag Number:    Hazardous Condition:    Red Tag Comments:   
Office Review?:   
Odorant Perceptible: Y    CGI Serial Number:    Reviewer:   
Review Reason:   
Comments: VERIFIED MTR PROTECTION IN PLACE AND SECURED TO HOUSE. VERIFIED PRESS TAG FROM CTY OF REXBURG. CHECKED PRESS @ REG. SET MTR AND CYCLED GAS THRU-VERIFIED ERT/INDEX UPDATING & DRIFT RATE - BOLDED SET AND NO LEAKS FOUND



**Exhibit 8 – Conrad Snow Protection – Before and After**  
Conrad Proposed Meter Protection – Denied by IGC



Conrad Final Meter Protection – Approved by IGC

